

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**Docket No. 2019-353-C**

**Application of NextGen )  
Communications, Incorporated for a )  
Certificate of Public Convenience and )  
Necessity to Provide Resold and )  
Facilities-Based Local Exchange )  
Telecommunications Services in the )  
State of South Carolina, and for )  
Alternative and Flexible Regulation, )  
and for Expedited Consideration )**

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**NextGen Communications, Incorporated**

**Direct Testimony of Kent Hellebust, President**

NEXTGEN COMMUNICATIONS, INC.  
DOCKET NO. 2019-353-C  
DIRECT TESTIMONY OF KENT HELLEBUST

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1 **Q. Will you please state your name and business address.**

2 A. My name is Kent Hellebust. My business address is 2401 Elliott Avenue, Seattle, Washington 98121.

3  
4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by TeleCommunication Systems, Inc. ("TSYS"), a wholly owned subsidiary of  
6 Comtech Telecommunications Corp. ("Comtech"). I hold the position of President of the Safety and  
7 Security Technologies (nonlegal) division of TSYS, and am also president of TSYS's wholly-owned  
8 subsidiary, NextGen Communications, Inc. ("NextGen").  
9

10 **Q. Please give a brief description of your background and experience.**

11 A. I have worked for TSYS for eight years and have served as President of TSYS's Safety and Security  
12 Technologies division and as President of NextGen since 2018. Prior to April 2018, I served as  
13 TSYS's Vice President and General Manager of the wireless and VoIP businesses. In addition, prior  
14 to TSYS and NextGen's acquisition by Comtech, I served as Vice President of TSYS's Safety &  
15 Security Group. Before joining TSYS, I served as the Chief Marketing Officer and General Manager  
16 of the SMB segment of Access Line Communications. I have also previously served as Executive  
17 Vice President of Infospace, Senior Vice President of Bsquare Corp, and Director of Marketing and  
18 Product Management at AT&T Wireless (now AT&T Mobility). I graduated with a Masters in  
19 Business Administration from The Wharton School of the University of Pennsylvania, and with a  
20 Bachelor of Arts degree in Economics from Wesleyan University.  
21

22 **Q. What is the purpose of your testimony?**

23 A. The purpose of my testimony is to present evidence describing the technical, managerial, and financial  
24 fitness of NextGen Communications to provide resold and facilities-based local exchange  
25 telecommunications services in the State of South Carolina, and for Alternative and flexible  
26 regulation. This testimony will also describe the services proposed by NextGen. Finally, the purpose  
27 of my testimony is to show that the public interest will be served by approval of the application of  
28 NextGen for a certificate of public convenience and necessity.

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1 **Q. Do you intend to incorporate by reference any documents into your testimony?**

2 A. Yes, I wish to incorporate by reference the underlying Application filed in this proceeding and its  
3 associated exhibits. All of the statements and exhibits in the application are correct and true to the  
4 best of my knowledge.  
5

6 **Q. Has NextGen registered to do business in South Carolina?**

7 A. Yes. NextGen received Secretary of State Authority in South Carolina on February 4, 2009.  
8

9 **Q. Please explain the Company's corporate structure.**

10 A. NextGen, a Maryland corporation, is a wholly-owned subsidiary of TeleCommunication Systems, Inc.  
11 (“TSYS”), and an indirect, wholly-owned subsidiary of Comtech Telecommunications Corp.  
12 (“Comtech”).  
13

14 **Q. Please describe the services NextGen intends to provide within the State of South Carolina.**

15 A. NextGen intends to offer 9-1-1 emergency services to government and quasi-government Public  
16 Safety Answering Points (“PSAPS”), including 9-1-1 selective routing, switching, aggregation and  
17 call transport. NextGen intends to provide emergency call routing, transport, and related  
18 functionalities to state and municipal governmental agencies to support PSAP operations. NextGen  
19 will rely primarily on existing facilities obtained from other carriers and utilities, however, NextGen  
20 may decide to construct its own facilities if deemed necessary.  
21

22 **Q. Where in South Carolina does NextGen intend to offer its services?**

23 A. NextGen intends to offer its services throughout the State of South Carolina.  
24

25 **Q. How are billing errors, complaints and trouble reports handled?**

26 A. NextGen provides strong customer support service. For billing inquiries, customers are initially  
27 directed to a toll-free number for consumer inquiries (1-800-959-3749). Greg Lathrop, Director,  
28 Strategic Programs, Comtech Safety & Security Technologies, is responsible for customer service.  
29

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1 **Q. Describe the proposed NextGen South Carolina tariff.**

2 A. NextGen has included a proposed tariff, which contain the rules, regulations, and rates for its services  
3 as Exhibit B of the Application.  
4

5 **Q. Describe NextGen's proposed services.**

6 A. NextGen proposes to provide 9-1-1 Emergency Services and NG9-1-1 Emergency Services in the  
7 State of South Carolina.  
8

9 **Q. In what states is NextGen currently certificated?**

10 A. NextGen holds certificates of authority or is registered to provide intrastate telecommunications  
11 services in Alabama, Alaska, Arizona, Arkansas, Connecticut, Delaware, Georgia, Hawaii, Illinois,  
12 Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota,  
13 Mississippi, Missouri, Nebraska, Nevada, New Jersey, New Hampshire, New Mexico, New York,  
14 North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, Utah,  
15 Vermont, Virginia, and Wisconsin. In many of these states, NextGen is currently only providing  
16 VoIP Positioning Center ("VPC") and Mobile Positioning Center ("MPC") services.  
17

18 **Q. Describe NextGen's financial ability to operate as a telecommunications provider.**

19 A. NextGen has sufficient financial resources to provide the services in South Carolina. The Company  
20 provided financial statements as part of its application.  
21

22 **Q. Do you believe NextGen is capable of delivering its proposed services in South Carolina?**

23 A. Yes, in addition to having sufficient financial resources, the management team of NextGen has a  
24 strong background in telecommunications as demonstrated by the biographies included as **Exhibit D**  
25 to the Company's application.  
26

27 **Q. Did NextGen request any waivers in its application?**

28 A. Yes. NextGen requested waivers from any requirements that our financial records be maintained in  
29 conformance with the Uniform System of Accounts. We currently maintain our books and records in

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1 accordance with GAAP; and therefore do not possess the detailed cost data required by USOA. In  
2 addition, we requested a waiver of S.C. Reg. 103-610's requirement that our books be kept in South  
3 Carolina. Our records are currently maintained at our offices in Seattle, Washington. Maintaining its  
4 books and records in South Carolina would be unduly burdensome; NextGen will provide records  
5 upon request. NextGen's registered agent in South Carolina is Corporation Service Company and will  
6 bear any costs associated with the Commission's inspection of its books and records.

7  
8 **Q. Will the services your Company intends to provide meet the service standards of the**  
9 **Commission?**

10 A. Yes.

11  
12 **Q. Will granting your application adversely impact the availability of affordable local exchange**  
13 **service?**

14 A. No.

15  
16 **Q. Will NextGen support universally available telephone service at affordable rates as required by**  
17 **the Commission?**

18 A. Yes.

19  
20 **Q. How will South Carolina consumers benefit from NextGen's services?**

21 A. Certification of NextGen will serve the public interest by increasing competition in the provision of  
22 telecommunications services in South Carolina, in particular, the availability of competitive options  
23 for NG9-1-1 services. NextGen's entry into the market promotes technological innovation and cost  
24 efficiencies for customers in South Carolina.

25  
26 **Q. Does this conclude your testimony?**

27 A. Yes.

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Application of NextGen Communications, )  
Inc. for a Certificate of Public )  
Convenience and Necessity to Provide )  
Resold and Facilities-Based Local )  
Exchange Telecommunications Services )  
in the State of South Carolina, and for )  
Alternative and Flexible Regulation, and )  
for Expedited Consideration )

**CERTIFICATE OF SERVICE**

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This is to certify that I, Toni Hawkins, a paralegal with the law firm of Robinson Gray Stepp & Laffitte, LLC have this day served a copy of the Direct Testimony of Kent Hellebust on behalf of NextGen Communications, Incorporated in the foregoing matter via electronic mail as follows:

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Dated at Columbia, South Carolina this 30<sup>th</sup> day of December, 2019.



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